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ABSTRACT

This self-assessment guide is designed to help financial aid offices review their policies, procedures, and practices to determine if they are in compliance with Title IX regulations. The questionnaire addresses itself to both the proportions of aid received by men and women as well as the institution's prevailing policies that determine those proportions. The guide details the demographic information necessary for the self-assessment; the type of information that should be contained in the institutions publications and informational brochures regarding nondiscrimination on the basis of sex; and application procedures and policies. A need analysis format is provided as are specific guidelines for various types of aid programs, including fellowships, scholarships, grants, endowments, outside sources of funds and single-sex scholarships, athletic scholarships, student employment, assistantships, and loans. The questionnaire provides a guide for evaluation of the existing policies and procedures and points out areas that may need revision to facilitate full compliance. (JMF)

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TITLE IX SELF-ASSESSMENT GUIDE FOR FINANCIAL AID OFFICES

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TITLE IX SELF-ASSESSMENT GUIDE FOR FINANCIAL AID OFFICES

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I. Introduction and General Information

This self-assessment guide is designed to help financial aid offices review their policies, procedures, and practices to determine if they are in compliance with Title IX regulations. The questionnaire addresses itself to both the proportions of aid received by men and women, as well as the institution's prevailing policies which determine those proportions.

Title IX regulations require that an institution's self-assessment meet these basic requirements:

1. The self-assessment must evaluate the current policies of an institution to determine if the effects of these policies are discriminatory on the basis of sex. (86.3, ci)

2. The self-assessment must aid the institution in modifying any current discriminatory policies. (86.3, cii)

3. The self-assessment should indicate ways in which the institution can remediate the past effects of discriminatory policies. (86.3, a)

4. The self-assessment must be complete by July 21, 1976. (86.1)

5. The self-evaluation itself, along with proposals to modify policies and remediate the effects of non-compliance must be available for review by the Department of Health, Education, and Welfare for at least three years after the completion of the self-assessment. (86.3, d)

6. The results of each institution's self-assessment must be made available to the campus community through its Title IX coordinator. (86.3, d)

Because of the diversity of institutions and financial aid programs, the self-assessment guide is designed to address a broad population and variety of situations. The guide may, therefore, deal with some issues and programs which are not relevant to a particular institution. Furthermore, some institutions may experience greater difficulty than others in retrieving necessary information. For these reasons, it is suggested that the guide be adopted to the needs of each institution.

The following general information will help financial aid offices gain an overview of Title IX requirements:

Except under certain conditions, in providing financial assistance to any of its students, an institution (recipient) shall not:

1. Provide different amounts or types of assistance, limit eligibility for assistance, apply different criteria, or otherwise discriminate on the basis of sex. (86.37, a (1))

2. Assist any foundation, trust, agency, organization or person which provides financial assistance to any student in a manner which discriminates on the basis of sex. (86.37, a (2))

Financial aid established by certain legal instruments:

1. A recipient may: Administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established by a domestic or foreign will, trust, bequest, or similar legal instrument or by acts of a foreign government which require that such award be made to members of a particular sex. (86.37 (b))

   PROVIDED: The overall effect of the awarding of sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex. (86.37 (b))

2. To insure nondiscriminatory awards, recipients shall develop and implement procedures by which:

   a. Students are selected for awards on the basis of non-discriminatory criteria and not on the basis of the availability of funds restricted to members of a particular sex. (86.37 (b) 2i)

   b. Appropriate sex-restricted scholarships, fellowships, or other forms of financial assistance are allocated to each student on the basis of non-discriminatory criteria. (86.37 (b) 2ii)

   c. No student is denied the award for which he or she was selected because of the absence of a scholarship, fellowship, or other form of financial assistance designated for a member of that student's sex. (86.37 (b) 2iii)

Athletic Scholarships

1. Where men are afforded opportunities for athletic scholarships, the final regulation requires that women also be afforded these opportunities. Specifically, the regulation provides:

   "To the extent that a recipient awards athletic scholarships or grants-in-aid, it must provide reasonable opportunities for such awards for members of each sex in proportion to the number of students of each sex participating in interscholastic or intercollegiate athletics." (86.37 (c))

An institution's application for funds must be accompanied by an assurance statement indicating that financial aid activities will be administered in compliance with Title IX regulations. (86.4 (a))

A statement of assurance will be acceptable only if an institution commits itself to the intent and regulations of Title IX as interpreted by the Director of the Office for Civil Rights, Department of Health, Education, and Welfare (86.4 (a)).

Financial Aid Offices may not discriminate on the basis of sex in their counseling responsibilities. Specifically, the assignment of counselors to students may not be based on sex. Furthermore, the distribution of information during counseling sessions or the use of counseling materials may not discriminate on the basis of sex. (86.36).

II. Demographic Information

The following information should be collected prior to the actual self-evaluation and referred to in completing subsequent sections:

1. What is the total student enrollment at your institution? _____

2. What is the total undergraduate enrollment? _____

3. What is the total graduate enrollment? _____

4. What is the total number of male undergraduates? _____

   a. What percent of the total undergraduate population is male? _____

5. What is the total number of female undergraduates? _____

   a. What percent of the total undergraduate population is female? _____

6. What is the total number of male graduate students? _____

   a. What percent of the total graduate population is male? _____

7. What is the total number of female graduate students? _____

   a. What percent of the total graduate population is female? _____

8. What is the total number of students, both graduate and undergraduate, applying for financial aid at your institution? _____

   a. Of the total student population, what percent apply for financial aid? _____

   b. Of the total student population who apply for financial aid, what percent actually receive financial assistance? _____

   c. What is the total dollar amount awarded? _____

9. What is the total number of males applying for financial aid at your institution? _____

   a. Of the total male population, what percent apply for financial aid? _____

   b. What is the net financial need of male applicants? _____

   c. Of the total male population applying for aid, what percent actually receive financial assistance? _____

   d. What is the total dollar amount awarded? _____

10. What is the total number of females applying for financial aid at your institution? _____

    a. Of the total female population, what percent apply for financial aid? _____

    b. What is the net financial need of female applicants? _____

    c. Of the total female population applying for aid, what percent actually receive financial assistance? _____

    d. What is the total dollar amount awarded? _____

11. Identify all of the aid programs available to all students at your institution. (Respond below)

12. What is the total dollar amount available in each of these programs? (Respond below)

13. For each program, what is the dollar amount received by men? What is the dollar amount received by women? (Respond below)

USE THIS SPACE FOR YOUR RESPONSES TO QUESTIONS 11, 12, AND 13

(11) PROGRAMS	(12) TOTAL DOLLARS AVAILABLE	(13) AID TO MEN	(13) AID TO WOMEN
SEOG			
NDSL			
CWSP			

III. Publications and Informational Brochures

1. Does your institution publish informational brochures, bulletins, catalogs, or applications which describe financial aid programs? _____

2. Do these publications include a predominantly displayed statement indicating that your institution does not discriminate on the basis of sex in the awarding of financial assistance? _____
(Title IX requires that such a notice be predominantly displayed on such materials).

3. Do any of these publications include statements in the text or illustrations which suggest that your institution treats applicants or students differently on the basis of sex? _____

4. What are your institution's policies with regard to the distribution of informational brochures, catalogs, or applications? (Title IX requires that the same brochures and applications be equally available to both sexes).

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5. Can you justify any inequities or inconsistencies in your policies concerning publications and informational brochures? Explain and support your position.

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IV. Application Procedures and Policies

Although this section is directed primarily toward the compliance of institutionally authored applications, you should be aware that you are also responsible for discriminatory practices which result from the use of nationally standardized financial statements.

1. List the applications required by your institution from students applying for financial assistance.

2. Of these applications, do those authored by your office include a statement specifying that your institution does not discriminate on the basis of sex in awarding financial assistance to students? _____
(Title IX regulations require that such a statement be predominantly displayed on applications).

3. Do the applications require information on marital or parental status? If yes, what is the effect of using this information in the distribution of assistance?

4. Do the applications request information concerning the sex of the applicant? If yes, what is the effect of using this information in the distribution of assistance?

5. Do the applications request information which may indirectly reveal or imply an applicant's sex? For example, is information about activities, memberships, or residence requested? Is this information in fact used to discern an applicant's sex?

6. Can you justify any inconsistencies or inequities in the content or distribution of the financial aid applications authored by your office? Explain and support your position.

V. Need Analysis Format

1. What need analysis system(s) is/are utilized by your institution in determining financial need of applicants?

_____

_____

_____

_____

2. Does your need analysis system discriminate on the basis of sex in its treatment of income?

   a. Is income treated differently depending on the sex of the principal wage earner? _____

   b. Is income treated differently in one parent families depending on the sex of the parent? _____

   c. Is the sex of the parent taken into consideration in analyzing the income of divorced or separated families? _____

   d. Does your need analysis system discriminate in its treatment of income in other ways? Explain and support your response.

_____

_____

_____

_____

3. Does your need analysis system discriminate on the basis of sex in its treatment of assets?

   a. Are assets treated differently in one parent families depending on the sex of the parent? _____

   b. Is the sex of the parent taken into consideration in analyzing the assets of divorced or separated families? _____

   c. Does your need analysis system discriminate in its treatment of assets in other ways? Explain and support your response.

_____

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4. Are adjustments made to the computed parents' contribution depending on the sex of the applicant or the sex of siblings in college? _____

5. Does your need analysis system discriminate on the basis of sex in its treatment of a student's summer savings, assets, benefits, or other resources? _____

6. Does your need analysis system discriminate on the basis of sex in any other way in determining an applicant's financial need? _____

7. a) What is your institution's approved student budget for men? _____

   b) What is your institution's approved student budget for women? _____

8. Justify any inequities, inconsistencies, or imbalances which exist in your need analysis format. Explain and support your position.

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9. In view of the information and justifications you provided above, is the overall effect of your need analysis policies and practices discriminatory on the basis of sex? If no, explain and support your position. If yes, explain your plans for resolution of non-compliance in Section VIII.

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VI. Aid Programs

If your institution administers separate programs which fall into any of the following categories, the items should be answered for each individual aid program.

VI-A Fellowships

1. Does your institution offer fellowships? _____

2. How many students apply for fellowship assistance? _____

   a. How many applicants are men? _____

   b. What percent of the total male population apply for fellowships? _____

   c. How many applicants are women? _____

   d. What percent of the total female population apply for fellowships? _____

3. How many students actually receive fellowship funds? _____

   a. How many recipients are men? _____

   b. What percent of the total male population receive fellowship assistance? _____

   c. How many recipients are women? _____

   d. What percent of the total female population receive fellowship assistance? _____

4. What is the total dollar amount available to all students from all fellowship programs? _____

   a. What is the dollar amount received by men? _____

   b. What percent of the available fellowship funds are received by men? _____

   c. What is the dollar amount received by women? _____

   d. What percent of the available fellowship funds are received by women? _____

5. What is the criteria used in determining who may apply for fellowship funds?

_____

_____

_____

_____

6. What is the criteria used in determining recipients of fellowship funds?

7. In selecting recipients of fellowship assistance, are assumptions or distinctions made on the basis of sex? _____

8. Justify any inequities, inconsistencies, or imbalances in the statistical information you reported in items 1-4 above. Explain and support your position.

9. Justify any inequities, inconsistencies, or imbalances in the information you reported in items 5-7 above concerning your policy in administering fellowships. Explain and support your position.

10. In view of the information and justifications you provided above, is the overall effect of your policies and practices concerning fellowships discriminatory on the basis of sex? If no, explain and support your position. If yes, explain plans for resolution of non-compliance in Section VIII.

VI-B Scholarships

1. Does your institution administer scholarships designating a particular sex in a will, trust, or similar legal instrument? (Single sex scholarships) _____

2. How many students applied for scholarship assistance? _____

   a. How many applicants are men? _____

   b. What percent of the total male population apply for scholarships? _____

   c. How many applicants are women? _____

   d. What percent of the total female population apply for scholarships? _____

3. How many students actually receive scholarship funds? _____

   a. How many recipients are men? _____

   b. What percent of the total male population receive scholarships? _____

   c. How many recipients are women? _____

   d. What percent of the total female population receive scholarships? _____

4. What is the total dollar amount available to all students for all scholarship programs? _____

   a. What is the total dollar amount received by men? _____

   b. What percent of the available scholarship funds are received by men?

   c. What is the dollar amount received by women? _____

   d. What percent of the available scholarship funds are received by women? _____

5. What is the criteria used in determining who may apply for scholarships?

_____

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6. What is the criteria used in determining recipients of scholarships?

7. In selecting recipients of scholarship assistance, are assumptions or distinctions made on the basis of sex? _____

8. Justify any inequities, inconsistencies, or imbalances in the statistical information you reported in items 1-4 above. Explain and support your position.

9. Justify any inequities, inconsistencies, or imbalances in the information you reported in items 5-7 concerning your policy in administering scholarships. Explain and support your position.

10. In view of the information and justifications you provided above, is the overall effect of your policies and practices concerning scholarships discriminatory on the basis of sex? If no, support and explain your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

VI-C Grants

1. Does your institution offer grants? _____

2. How many students apply for grant assistance? _____

    a. How many applicants are men? _____

    b. What percent of the total male population apply for grants? _____

    c. How many applicants are women? _____

    d. What percent of the total female population apply for grants? _____

3. How many students actually receive grant funds? _____

    a. How many recipients are men? _____

    b. What percent of the total male population receive grants? _____

    c. How many recipients are women? _____

    d. What percent of the total female population receive grants? _____

4. What is the total dollar amount available to all students for all grant programs? _____

    a. What is the dollar amount received by men? _____

    b. What percent of the available grant funds are received by men? _____

    c. What is the dollar amount received by women? _____

    d. What percent of the available grant funds are received by women? _____

5. What is the criteria used in determining who may apply for grants?

_____

_____

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6. What is the criteria used in determining recipients of grants?

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_____

7. In selecting recipients of grant assistance, are assumptions or distinctions made on the basis of sex? _____

8. Justify any inequities, inconsistencies, or imbalances in the statistical information you reported in items 1-4 above. Explain and support your position.

_____

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9. Justify any inequities, inconsistencies, or imbalances in the information you reported in items 5-7 concerning your policies in administering grants?

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10. In view of the information and justifications you provided above, is the overall affect of your policies and practices concerning grants discriminatory on the basis of sex? If no, support and explain your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

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VI-D Endowments

1. Does your institution offer endowments? _____

2. How many students apply for endowment assistance? _____

    a. How many applicants are men? _____

    b. What percent of the total male population apply for endowments? _____

    c. How many applicants are women? _____

    d. What percent of the total female population apply for endowments? _____

3. How many students actually receive endowment funds? _____

    a. How many recipients are men? _____

    b. What percent of the total male population receive endowments? _____

    c. How many recipients are women? _____

    d. What percent of the total female population receive endowments? _____

4. What is the total dollar amount available to all students for endowment programs? _____

    a. What is the dollar amount received by men? _____

    b. What percent of the available endowment funds are received by men? _____

    c. What is the dollar amount received by women? _____

    d. What percent of the available endowment funds are received by women? _____

5. How many endowments are available at your institution? _____

    a. Of those available, how many endowments are restricted to male recipients only? _____

    b. Of those available, how many endowments are restricted to female recipients only? _____

6. What is the criteria used in determining who may apply for endowments?

_____

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7. What is the criteria used in determining recipients of endowments?

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8. In selecting recipients of endowments, are assumptions or distinctions made on the basis of sex? _____

9. Justify any inequities, inconsistencies, or imbalances in the statistical information you reported in items 1-5 above. Explain and support your position.

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10. Justify any inequities, inconsistencies, or imbalances in the information you reported in items 6-8 concerning your policies in administering endowments. Explain and support your position.

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11. In view of the information and justifications you provided above, is the overall affect of your policies and practices concerning endowments discriminatory on the basis of sex? If no, explain and support your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

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VI-E Single Sex Scholarships

1. Does your institution solicit, list, approve, publicize, or otherwise provide assistance or services to any foundation, agency, trust, organization, or person offering sex restricted financial aid in any of the following forms - scholarships, fellowships, assistantships, grants, loans, or employment opportunities? _____

   a. If yes, what is the nature of such assistance or services.

   _____

   _____

   _____

   _____

   b. Is the overall affect of such assistance or service discriminatory on the basis of sex? _____

2. Does your institution provide any other type of assistance or service to such foundations, agencies, trusts, organizations or persons who discriminate on the basis of sex? For example, do you provide need analysis for processing of applications for funds from such agencies? _____

3. Does the institution administer scholarships, fellowships, or other forms of financial assistance established by a domestic or foreign will, trust, bequest, or similar legal instrument which requires that such awards be made to a member of a particular sex? _____

   a. If so, how many legal instruments specify males only as recipients? _____

   b. What is the dollar amount of such legal instruments which specify male recipients only? _____

   c. How many legal instruments specify females only as recipients? _____

   d. What is the dollar amount of such legal instruments which specify female recipients only? _____

4. Are the recipients of these awards selected or identified on the basis of criteria other than a student's sex? _____

   a. Identify the methods or criteria by which recipients are selected for these awards.

   _____

   _____

   _____

   _____

5. Does your institution deny an award for which a student was selected because of the absence of scholarships, fellowships, or other forms of financial assistance designated for a member of that student's particular sex? _____

6. Has your institution made an attempt to secure additional funds from non-sex restricted sources? _____

7. Is the overall affect of the sex restricted scholarships, fellowships, or other forms of financial assistance discriminatory on the basis of sex? If yes, justify the imbalances and inconsistencies and support your position.

_____

_____

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_____

8. In view of the information and justifications you provided above, is the overall affect of your policies and practices concerning Single Sex scholarships discriminatory on the basis of sex. If no, explain and support your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

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VI-F Athletic Scholarships

1. Do you offer scholarships to athletes on a no-need basis? _____

2. How many no-need athletic scholarships are received by men? _____

   a. What is the dollar amount? _____

3. How many no-need athletic scholarships are received by women? _____

   a. What is the dollar amount? _____

4. What percent of the male population participating in inter-collegiate athletics are in receipt of need-based scholarships?

5. What percent of the female population participating in inter-collegiate athletics are in receipt of need-based scholarships?

6. Taking into consideration the percentage of the total female population participating in inter-collegiate athletics and the percentage of the total male population participating in inter-collegiate athletics, are scholarship monies (no need) proportionately distributed to student athletes of both sexes?

7. Taking into consideration the percentage of the total female population participating in inter-collegiate athletics and the percentage of the total male population participating in inter-collegiate athletics, are scholarship monies (need based) proportionately distributed to student athletes of both sexes?

8. In view of the information provided above, is the overall effect of your policies and practices concerning aid to athletes (need and no-need) discriminatory on the basis of sex? If no, explain and support your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

VI-G Student Employment

1. What is the number of students working for your institution? _____

   a. Of the population of students who work at your institution, what is the number of males? _____

   b. Of the population of students who work at your institution, what is the number of females? _____

2. Do you have a policy for selecting student employees? _____

3. What is this policy? Does this policy have the overall affect of discriminating against one sex or the other in hiring practices? If there is no explicit policy regarding the selection of student employees, how does the institution prevent or control discriminatory hiring practices?

_____

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_____

4. What is the number of student jobs available on your campus? Of the jobs available for student employees, are there categories of positions which are held predominantly by males or held predominantly by females?

_____

_____

_____

_____

5. Of the jobs held predominantly by one sex, is reasonable opportunity available to members of the other sex for employment in those positions? _____

6. Do your hiring practices for student employees include different criteria for one sex than they do for the other? Does this policy or practice lead to the employment of more members of one sex than the other in certain job categories?

_____

_____

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_____

7. Does your institution list, solicit, approve, or otherwise publicize employment opportunities for students which discriminate on the basis of sex? _____

8. If you provide students with job listings, do you include a statement of policy specifying that your institution will not accept or list positions which discriminate on the basis of sex? _____

9. Does your institution have a policy concerning pay rates for student employees? _____

10. Is there a distinction made in the pay rates on the basis of sex? _____

11. Does your institution have job categories which are held by both men and women for which one sex is paid less than the other? _____

12. Does your institution have employment criteria based on sex for student employees which affect hiring practices, pay rates, or advancement? _____

13. If your institution administers a Federal College Work-Study Program in cooperation with off-campus agencies, have you established a procedure to assure yourself that such agencies do not discriminate against students on the basis of sex? _____ (Title IX indicates that the institution must establish such a procedure).

14. Has your institution established a procedure to assure itself that campus supervisors of student employees do not discriminate on the basis of sex in hiring practices, pay rates, assignments of duties, or other aspects of student employment? _____

15. Justify any inequities, inconsistencies, or imbalances in the information you provided above concerning your institution's policies and practices in administering student employment programs.

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16. In view of the information and justifications you provided above, is the overall affect of the policies concerning student employment discriminatory on the basis of sex? If no, explain and support your position. If yes, explain your plans for resolution of non-compliance in Section VIII.

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VI-H Assistantships

1. Does your institution offer graduate or undergraduate assistantships? _____

2. How many assistantship positions are available? _____

3. How many students apply for assistantships? _____

   a. How many applicants are men? _____

   b. What percent of the total male population apply for assistantships? _____

   c. How many applicants are women? _____

   d. What percent of the total female population apply for assistantships? _____

4. How many students actually receive assistantship positions? _____

   a. How many recipients are men? _____

   b. What percent of the total male population receive assistantships? _____

   c. How many recipients are women? _____

   d. What percent of the total female population receive assistantships? _____

5. What is the total dollar amount available to students from all assistantship programs? _____

   a. What is the dollar amount received by men? _____

   b. What percentage of the available assistantship funds are received by men? _____

   c. What is the dollar amount received by women? _____

   d. What percentage of the available assistantship funds are received by women? _____

6. What is the criteria used in determining who may apply for assistantships?

_____

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7. What is the criteria used in determining recipients of assistantship funds?

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8. In selecting recipients of assistantships, are assumptions or distinctions made on the basis of sex? _____

9. Are certain types of assistantship positions at your institution held predominantly by one sex rather than the other? If yes, explain the imbalances.

_____

_____

_____

_____

10. Among assistantship recipients, is there equal opportunity in different job categories? _____

11. Justify any inequities, inconsistencies, or imbalances in the statistical information you reported in items 2-5 above. Explain and support your position.

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12. Justify any inequities, inconsistencies, or imbalances in the information you reported in items 6-10 concerning your policy in administering assistantships. Explain and support your position.

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13. In view of the information and justifications you provided above, is the overall affect of your policies and practices concerning assistantships discriminatory on the basis of sex? If no, explain and support your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

VI-I Loans

1. Does your institution administer loan programs? _____

2. How many students apply for loan assistance? _____

   a. How many applicants are men? _____

   b. What percent of the total male population apply for loans? _____

   c. How many applicants are women? _____

   d. What percent of the total female population apply for loans? _____

3. How many students actually receive loan funds? _____

   a. How many recipients are men? _____

   b. What percent of the total male population receive loans? _____

   c. How many recipients are women? _____

   d. What percent of the total female population receive loans? _____

4. What is the total dollar amount available to all students for all loan programs?

   a. What is the total amount received by men? _____

   b. What percent of the available loan funds are received by men?

   c. What is the total amount received by women? _____

   d. What percent of the available loan funds are received by women? _____

5. What is the criteria used in determining who may apply for loans?

_____

_____

_____

_____

6. What is the criteria used in determining recipients of loans?

7. In selecting recipients of loan assistance, are assumptions or distinctions made on the basis of sex? _____

8. Justify any inequities, inconsistencies, or imbalances in the information you provided in items 2-4 above. Explain and support your position.

9. Justifv any inequities, inconsistencies, or imbalances in the information you provided in items 5-7 concerning your policies in administering loans. Explain and support your position.

10. In view of the information and justifications you provided above, is the overall affect of your policies and practices concerning loans discriminatory on the basis of sex? If no, explain and support your position. If yes, explain your plan for resolution of non-compliance in Section VIII.

VIII. Evaluation and Compliance with Title IX Regulations

This section of the self-assessment is designed to help summarize and evaluate the findings of the questionnaire. By reviewing your responses to the previous sections, you should now be able to determine the extent of your institution's compliance or non-compliance with the intent and regulations of Title IX.

Answers to the following questions should reflect, in summary form, your conclusions in each of the previous sections.

1. Publications and Informational Brochures

   Do the policies and procedures governing the publications and distribution of informational brochures adhere to Title IX regulations? You must now be able to justify any inconsistencies in the content and policies concerning these publications which are based on a student's sex. Support your position.

2. Application Procedures and Policies

   Do your policies and procedures concerning all aspects of applications adhere to the regulations of Title IX? If you believe that you are in compliance with Title IX, you must now justify any inconsistencies in processing applications which are based on a student's sex. Support your position.

3. Need Analysis Format

Do your policies and procedures concerning need analysis comply with Title IX? Justify any inconsistencies based on sex and support your position.

4. Aid Programs

Do your policies and practices concerning the administration of your institution's aid programs adhere to the regulations of Title IX? You should now be able to determine which of your aid programs do or do not comply. If some programs contain inconsistencies based on sex, you must now justify these and support your position that you are in compliance. Support your justification.

VIII. Resolution of Non-Compliance

Title IX regulations require that discriminatory practices be addressed and revised to eliminate on-going discrimination and to remediate the past effects of such practices. This section of the self-assessment guide is intended to help institutions outline their plans to achieve compliance with Title IX.

The following set of questions should be applied to the four major areas in Section VII, "Evaluation and Compliance with Title IX Regulations".

1. In evaluating your self-assessment, have you determined that discriminatory practices exist which cannot be justified or whose justification is not supportable? List these policies or practices under the following categories:

   a. Publications and Informational Brochures

   _____

   _____

   _____

   _____

   _____

   b. Application Procedures and Policies

   _____

   _____

   _____

   _____

   _____

   c. Need Analysis Format

   _____

   _____

   _____

   _____

   _____

d. Aid Programs

2. Briefly outline your plans to address these discriminatory policies and explain how your new policies will achieve compliance and remediate the past effects of discrimination.

a. Publications and Informational Brochures

b. Application Procedures and Policies

c. Need Analysis Format

d. Aid Programs

3. Estimate the impact, in terms of time, cost, and personnel, required to implement the new policies.

a. Publications and Informational Brochures

b. Application Procedures and Policies

c. Need Analysis Format

d. Aid Programs